

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

NOIRE TURTON,  
et al.,

Plaintiffs,

V.

Civil Action No. 3:14cv446

VIRGINIA DEPARTMENT OF EDUCATION,  
et al.,

Defendants.

**ANSWER**

COMES NOW the Nnika E. White, Esq., and answers the Motion for Show Cause (the "Motion") filed by Patrick Andriano ("SunTrust") as follows:

1. Ms. White confirms that she mailed off the initial letter of apology as requested by the Court timely as of June 8, 2015. The letter was returned to Ms. White's office unopened as "person not at the above address".
2. Ms. White then resent the letter to Mr. Andriano's counsel of record on June 30, 2015.
3. Ms. White mailed by first class mail on July 1, 2015 the \$100.00 payment to Mr. Adriano. There was sufficient funds to pay the amount sent. The check was held by Mr. Adriano's office for several days then deposited. Unfortunately a state tax lien hit the account the day they submitted payment. Again although there were funds to pay both the tax lien and the check sent to Mr. Andriano, the bank froze Ms. White's accounts for 2 days. The accounts were released and the funds were released as well. Ms. White was on vacation and out of the office from July 21, 2015 until August 3, 2015 and informed Mr. Adriano's office of this fact. Ms. White also informed Counsel for Mr. Andriano that she would immediately take care of the matter when she came home, which she did by hand to Counsel's office.
4. Ms. White has since sent in \$400 certified funds by hand August 5, 2015 for the months of July, August, September and October, and as such is ahead by 3 months.

WHEREFORE, Ms. White prays that this Court dismiss the motion to show cause, and granting all other relief that this Court deems just and proper.

Respectfully Submitted:

/s/ Nnika E. White  
Nnika E. White, Esq. (VSB #47012)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2015, I mailed the foregoing Response via CM/ECF to and via first-class mail to all other necessary parties.

/s/ Nnika E. White  
Nnika E. White, Esq.  
*Counsel for Plaintiffs*